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15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17
18 LAS VEGAS SUN, INC., a Nevada
corporation,

19 Plaintiff,

20 v.

21
22 SHELDON ADELSON, an individual and as
the alter ego of News+Media Capital Group
23 LLC and as the alter ego of Las Vegas Review
Journal, Inc.; PATRICK DUMONT, an
individual; NEWS+MEDIA CAPITAL
24 GROUP LLC, a Delaware limited liability
company; LAS VEGAS REVIEW-JOURNAL,
25 INC., a Delaware corporation; and DOES, I-X,
26 inclusive,

27 Defendants.

28 Case No. 2:19-cv-01667-GMN-VCF

**JOINT STIPULATION TO SET
DEPOSITION PROTOCOLS**

1 LAS VEGAS REVIEW-JOURNAL, INC., a
2 Delaware corporation,

3 Counterclaimant,

4 v.

5 LAS VEGAS SUN, INC., a Nevada
6 corporation; BRIAN GREENSPUN, an
7 individual and as the alter ego of Las Vegas
Sun, Inc.; GREENSPUN MEDIA GROUP,
LLC, a Nevada limited liability company, as
the alter ego of Las Vegas Sun, Inc.,

8 Counterclaim-
9 Defendants.

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1 Plaintiff/Counterclaim-Defendant LAS VEGAS SUN, INC., and Counterclaim-
 2 Defendants BRIAN GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the
 3 “Sun”), by and through their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC,
 4 and the Alioto Law Firm, and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL,
 5 INC., and Defendants NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, and
 6 PATRICK DUMONT (collectively the “Review-Journal”), by and through their counsel of record,
 7 Kemp Jones, LLP, Jenner & Block LLP, and Richard L. Stone, hereby stipulate and agree as
 8 follows:

9 1. To ensure that depositions are conducted efficiently and to minimize disputes, all
 10 objections during depositions in this matter must be stated concisely in a nonargumentative and
 11 nonsuggestive manner consistent with Federal Rule of Civil Procedure 30(c)(2).

12 2. Objections to the form of a question shall be stated concisely, in words such as
 13 “Objection, form,” or “objection to form.” Objections to form shall include questions that are
 14 “leading or suggestive; ambiguous or uncertain; compound; assume facts not in evidence; call for
 15 a narration; call for speculation or conjecture; or argumentative.” *In re Stratosphere Corp. Sec.*
 16 *Litig.*, 182 F.R.D. 614, 618 (D. Nev. 1998). Questions for which the parties believe there is a lack
 17 foundation or improper foundation also fall within this category. The parties further agree that
 18 even though relevance objections do not need to be preserved at deposition, objections to “form”
 19 may be used to object on relevance grounds too. The failure to object on relevance grounds shall
 20 not be deemed an implied or express waiver of any relevance objections.

21 3. Although not necessary to avoid waiving an objection to the relevance of a
 22 question, counsel may state an objection to a question on the grounds that it seeks information that
 23 is irrelevant due to a prior Court order regarding document discovery. Such objections shall be
 24 stated as “objection, form” (as noted above) or, if counsel chooses, “objection, court order.”

25 4. Consistent with Federal Rule of Civil Procedure 32(d)(3)(B)(i), objections may also
 26 be made to an error or irregularity at the deposition on the rare occasion where it is necessary to
 27 avoid waiver, including to the form of an answer, the oath or affirmation, a party’s conduct, or
 28 other matters that might have been corrected at that time.

1 5. Counsel may instruct a deponent not to answer only when necessary to preserve a
2 privilege, to enforce a limitation ordered by the court, or to present a motion under Federal Rule
3 of Civil Procedure 30(d)(3). The determination not to instruct a witness not to answer a question
4 that violates a court order shall not be deemed an implied or express waiver of any objection or
5 right.

6 6. The deposing counsel may request the basis for an objection to determine whether
7 to restate a question. All counsel shall refrain from arguing the merits of objections on the record,
8 to avoid impeding, delaying, or frustrating the fair examination of the deponent.

10 DATED this 14th day of March 2022.

11 LEWIS ROCA ROTHGERBER CHRISTIE LLP

12 By: /s/ Kristen Martini

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29 *Attorneys for Plaintiff/ Counterclaim-
30 Defendants*

10 DATED this 14th day of March 2022.

11 KEMP JONES LLP

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27 Counterclaimant*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAS VEGAS SUN, INC., a Nevada corporation,

Plaintiff,

v.
SHELDON ADELSON, an individual and as the alter ego of News+Media Capital Group LLC and as the alter ego of Las Vegas Review Journal, Inc.; PATRICK DUMONT, an individual; NEWS+MEDIA CAPITAL GROUP LLC, a Delaware limited liability company; LAS VEGAS REVIEW-JOURNAL INC., a Delaware corporation; and DOES, I-X, inclusive,

Defendants.

LAS VEGAS REVIEW-JOURNAL, INC., a
Delaware corporation,

Counterclaimant,

V.

LAS VEGAS SUN, INC. a Nevada corporation; BRIAN GREENSPUN, an individual and as the alter ego of Las Vegas Sun, Inc.; GREENSPUN MEDIA GROUP, LLC, a Nevada limited liability company, as the alter ego of Las Vegas Sun, Inc.

Counterclaim Defendants.

The Court, having considered the parties' Joint Stipulation to Set Deposition Protocols, and good cause appearing therefore,

IT IS HEREBY ORDERED THAT:

1. The parties' stipulated protocols for depositions in this matter shall apply to all depositions in this matter.

IT IS SO ORDERED:

Dated this **15th** day of **March**, 2022.

SPECIAL MASTER PHILIP M. PRO

PROOF OF SERVICE

I hereby certify that on the 11th day of March, 2022, I served a true and correct copy of the foregoing **JOINT STIPULATION TO SET DEPOSITION PROTOCOLS** via the United States District Court's CM/ECF electronic filing system to all parties on the e-service list.

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/s/ Pamela Montgomery

An employee of Kemp Jones, LLP